

IN THE UNITED STATES BANKRUPTCY COURT

WESTERN DISTRICT OF NORTH CAROLINA

SHELBY DIVISION

IN THE MATTER OF:)	
)	CASE NO.: 16-40087
JOSHUA STEVEN EARLEY AND)	
AMANDA NEWTON EARLEY,)	CHAPTER 13
)	
DEBTORS.)	

RESPONSE TO OBJECTION TO CLAIM #12 FILED BY CAVALRY SPV 1 LLC
AND REQUEST FOR HEARING

Cavalry SPV 1 LLC (hereinafter "Cavalry"), by and through counsel, hereby responds to the Trustee's Objection to Claim #12 of Calvary (Document No. 17), and requests a hearing thereon. In support thereof, Calvary states that it is the owner and holder of a Contract executed by Amanda Newton Earley which granted a lien on a 2007 Kawasaki Bruteforce 4x4 ATV, VIN # JKAVFDB107B515087.

WHEREFORE, Cavalry prays the Court as follows:

1. That the Court allow the Proof of Claim as filed by Cavalry;
2. That the Court conduct a hearing on this matter; and
3. For such other and further reliefs that the Court may deem just and proper.

This the 15th day of July, 2016.

HUTCHENS LAW FIRM
Attorneys for Cavalry SPV 1 LLC

By: 

William Walt Pettit
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CERTIFICATE OF SERVICE

I, William Walt Pettit as attorney of record for Cavalry SPV 1 LLC, hereby certify that on the 15th day of July, 2016, I served a copy of the Response To The Trustee's Objection To Claim #12 filed by Cavalry SPV 1 LLC and Request for Hearing by either electronic notice in accordance with the local rules or by depositing the same, enclosed in a postpaid, properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Postal Service, said envelope being addressed as follows:

Joshua Steven Earley
Amanda Newton Earley
348 Right Prong Road
Ellenboro, NC 28040

Robert H. Lutz
Lutz Law Firm, PLLC
310-8 E. Graham Street
Shelby, NC 28150

Steven G. Tate
Chapter 13 Trustee
212 Cooper Street
Statesville, NC 28677

HUTCHENS LAW FIRM
Attorneys for Cavalry SPV 1 LLC

By: 

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